GOVERNMENT PURCHASE CARD
Ethics and Operations Training

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INTRODUCTION

•This training course is meant to highlight important concepts and augment the DoD Defense Acquisition University courses that you were required to take.

•The *Army Government Purchase Card Operating Procedures* are available for download from the Fort Sill website-GPC page and you are required to secure a copy and read it. You will be held accountable to it.

•The *Mission Installation Contracting Command Government Purchase Card Operating Procedures* are available for download from the Fort Sill website-GPC page and you are required to secure a copy and read it. You will be held accountable to it.

•The GPC APC will email policy updates and additions as they are published. (keep you email address up-to-date with the GPC APC)

GOVERNING REGULATIONS

- Army Government Purchase Card Operating Procedures
  (Required reading--download available from Fort Sill/Contracting/GPC webpage)
- MICC Government Purchase Card Operating Procedures
  (Required reading--download available from Fort Sill/Contracting/GPC webpage)
- Federal Acquisition Regulation (FAR), Part 8 Required Sources Of Supplies And Services
- Federal Acquisition Regulation (FAR), Part 13 “Simplified Acquisition Procedures”
- Defense Federal Acquisition Regulation Supplement (DFARS), Part 213.301 “Government-wide commercial purchase card”
- Army Federal Acquisition Regulation Supplement (AFARS), Part 5113.2 “Simplified Acquisition Procedures”
- Treasury Financial Manual, - Vol. I, Part 4, Ch. 4500, “Government Purchase Cards”
- Department of Defense (DOD) Financial Management Regulation (FMR) Vol. 10, Ch. 23, “Purchase Card Payments”
- DOD FMR Vol. 10, Ch. 23, Annex 1, “Purchase Card Certification Statements”
- DOD FMR Vol. 10, Ch. 2, “Discount Offers and Rebates/Refunds”
- DOD Government Charge Card Guidebook for Establishing and

CARD CHARACTERISTICS

- Internationally accepted VISA credit card.
- Distinctive Design for Government – Great Seal of the U.S.
- For Official US Government Purchases ONLY
  - State Sales Tax Exempt
- Card issued to and authorized for specific individual to use. Card bears the individual's name. The designated individual is the ONLY AUTHORIZED USER OF THE CARD!

CARDHOLDER AND BILLING OFFICIAL PURCHASE LIMITS

SET PURCHASE LIMITS

- Cardholder Single Purchase Limit (as of Oct 1st 2015):
  - Purchases for supplies shall not exceed **$3,500**.
  - Purchases of construction covered under the Davis Bacon Act (DBA) shall not exceed **$2,000.**
  - Purchases of services covered under the Service Contract Act (SCA) shall not exceed **$2,500.**

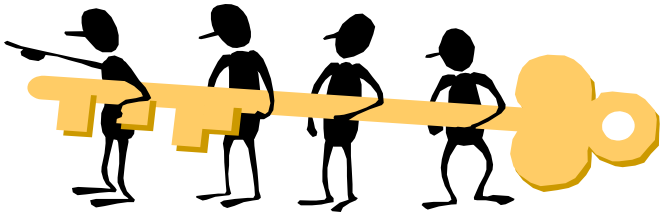
- Cardholder 30 Day Cycle Limit:
  - Total dollar amount that may be purchased by cardholder in the 30 day billing cycle.
  - May be equal to or greater than the single Purchase Limit.
- Billing Officials 30 Day Cycle Limit:
  - May be the cumulative total of all subordinate cardholders 30 day limits OR a specific monthly budget amount.

CARDHOLDER

- Activate and endorse card upon receipt
- Make legitimate purchase to satisfy a bona fide requirement at a fair and reasonable price.
- Enter the transaction details into the transaction log (offline) at the time the order is placed unless sufficient detail is entered into the GFEBS PR.
- Reconcile transactions via the bank's online software and Approve Monthly Statement of Account (SOA). Verify/sign & date SOA/approve transactions & cycle statement in ACCESS within 3 business days of the cycle closing date.
- Maintain Reference Materials (i.e. SOP's, MFR's, Delegation of Procurement Authority letter, DD577, etc.).
- Responsible for the physical security of the account number and card at all times.
- Do not allow anyone else to make purchases with your card.
- Discontinue purchasing and relinquish card to MICC - FORT SILL APC 30 calendar days prior to departure, termination, retirement.
- Complete required refresher training class annually.
- Forward all original documentation to billing official to include:
  - - SOA (transaction management approval page)
  - - receipts
  - - Disputes cardholder statement of questioned items
  - - Credit card log
  - - Funding authorizations
  - - FAR part 8 MARKET RESEARCH
  - - Required approvals
  - - Justification memos
  - - And other documentation as required

GPC CARD SECURITY

- Activate and endorse card upon receipt
- Keep your card in a locked container when not in use
- Instruct vendors to NOT put your card number on the invoice
  Instruct vendors to NOT save your credit card account number
- Report lost or stolen cards to US Bank Customer Service, Billing Official and APC IMMEDIATELY!
- Mask card/account number using the last 4 digits only in any form of written communication: I.e. XXXXXXXXXXXX5678
- Relinquish GPC to MICC - FORT SILL APC and discontinue use 45 calendar days prior to departure, re-assignment, retirement.



BILLING OFFICIAL RESPONSIBILITIES

- Responsible for oversight of Cardholders purchase activity (prevent improper, fraudulent, personal or split purchases) by reviewing intended purchases and approving in writing prior to purchase.
- Retain original Cardholder documents and records for each GPC cycle for 6 years and 3 months to include: CH original Statement of Account, copies of receipts and credits ,any dispute forms
- Not to exceed seven cardholders at one time, adding across any and all GPC Managing accounts they may be Primary or Alternate BO on.
- Review and maintain all guidance material provided by the MICC - FORT SILL
- Complete required annual GPC refresher training.
- Ensuring Cardholders fulfill their responsibilities by conducting Cardholder compliance reviews .
- Certify Billing Statement for payment NLT five (5) business days from cycle close – 19th of Month.
- Nominate Cardholder candidates through Resource Managers to Agency Program Coordinator (APC), and request cardholder account, maintenance through RM to APC
- Designate at lease one “Alternate Billing Official” to perform the Primary’s duties in their absence.
- Cancel and relinquish cards to MICC - FORT SILL APC at least 30 calendar days prior to cardholder departure, termination, retirement.
- Notify APC of Billing Official cancellation or departure following the MICC out-processing procedures guide.

Resource Manager Responsibility

- Reserve funds prior to GPC use by “L4” certifying GFEBS PR’s
- Define and complete financial management rules/parameters (LOA, cycle limits, etc.) for Cardholders and Billing Officials in the Organization.
- Determine reallocation rights and methods to be used by the organization
- Provide accounting support and guidance for GPC purchases for the Organization Users
- Review and maintain all guidance material provided by the MICC - FORT SILL
- Coordinate and process “Reject” invoice for manual payments

Agency Program Coordinator (APC) Responsibilities

- Maintain liaison with GSA, Bank, functional proponents
- Process account set-up and maintenance requests
- Develop, conduct and verify prescribed training for GPC participants
- Prepare and distribute policy and procedure guidance and Delegation of Authority Memoranda
- Perform annual oversight reviews to ensure policy and procedure compliance

U.S. BANK RESPONSIBILITIES

ISSUE PURCHASE CARDS

- Card will be sent to official Government work addresses (not personal residence).
- Cards are usually received within 2 weeks AFTER the APC receives all required paperwork.
- Contact the GPC Team if you have not received your card in 15 days.
- Statement available ON-LINE by the 20th of each month.
- Statements will NOT BE MAILED to cardholders. Use of the bank's ACCESS Online (A.X.O.L.) electronic ACCESS system is MANDATORY for all Army accounts. HTTPS://ACCESS.USBANK.COM
- US Bank A.X.O.L. Training Website is available to Cardholders and Billing Officials 24/7: Https://wbt.access.usbank.com
- A.X.O.L. Training Password: WBT password changes every 60 days contact your APC for updated password
- Cardholders, Billing Officials and Resource Managers will obtain an ACCESS ON Line user ID and Password when they complete the ACCESS Self Registration

ACCESS ONLINE (A.X.O.L.)

- **Cardholders** – MUST use the Transaction list and Order Matching in Transaction Management Module in A.X.O.L. This is MANDATORY and must be completed EACH month for EVERY transaction within 3 business days of cycle close, in order for billing officials to be able to certify the managing accounts.

- **Billing Officials** – SHALL use the Transaction Management / Transaction List Module feature to perform surveillance/oversight and "Final Approval" of cardholders transaction activity. Billing Officials must certify their managing accounts with in 5 business days of cycle close, in order for DFAS to pay the bank on time and full rebate credits to be earned.

- NO EXCEPTIONS!
  - If you have any questions about how to comply with the requirements listed above contact your APC!

APPROVING TRANSACTIONS AND STATEMENT

1. Check the amount billed and verify receipt of all items.

2. Approve transactions and statements within 5 calendar days of cycle ending.

3. Attach back-up documents to the Statement (receipts, approvals, written requisition) and forward package to Billing Official for document retention (6 years and 3 months).

4. The Billing Official will check for compliance and validity of purchases. NOTE: The Billing Official shall retain the Statement of Account and all supporting (original) documents. It is recommended that the cardholder maintain a copy of all documents provided to the Billing Official.

5. See Bank software training material for details regarding the online reconcilement, approval, and certification process.

Certification -- Suspension Policy

- 1. BO certifies within five working days (not calendar days) of cycle close (Army Policy). If the BO does not certify on time the MICC HQ policy is to immediately suspend the GPC accounts. Please mark your calendars and certify on time!

- 2. Certified or not, if payment has not been received by the bank 30 days after cycle close, your account is deemed "Past Due." MICC HQ policy is to suspend Past Due accounts until payment of the account is successful.

- 3. Accounts that are Past Due for 90 days are subject to the terms of the GSA Smartpay contract governing the Army GPC program and the Bank will lock those accounts with their own "Suspended" status until payment of the account is successful.

- 4. Accounts that remain in a Past Due status for 180 days will trigger the Smartpay Contract penalty terms that will cause the suspension of all related MACOM accounts on Fort Sill.

- Please mark your calendar for cycle close at midnight of the 19th every month. New cycle starts on the 20th and you have five working days to complete your certification of the managing account

ARMY PURCHASE CARD ACCOUNT SUSPENSION POLICY (cont.)

- ALL CARDHOLDER TRANSACTIONS ARE REVIEWED BY THE A/OPC ON A REGULAR BASIS FOR SUSPICIOUS, UNUSUAL, OR QUESTIONABLE ACTIVITY!
- Unauthorized use of the GPC and/or intentional violations of GPC policy/procedures may result in the following administrative actions:
  - Written Reprimand
  - Card Suspension
  - Card Cancellation
  - Personal liability for amount of purchase

- Additional suspensions can occur if:
  - A/OPC information requests are not answered in a timely manor.
  - BO records are not available for inspection (i.e. lost, missing, inaccessible).
  - Unauthorized purchases are discovered.
  - Fraud, waste, or abuse is detected.
  - Inadequate staffing (less than two billing officials)
    - You must have a Primary and Alt-BO at all times

SURVEILLANCE (REVIEWS)

- Surveillance, fraud detection and fraud reporting is a shared responsibility among all stakeholders.
- The Army GPC Operating Procedure requires an annual review of 100% of Billing Official accounts.
- APC screens ALL GPC ACTIVITY and conducts purchase reviews on all unusual spending activity.
- Billing Official is responsible for ON GOING surveillance of cardholder accounts.

SPLIT PURCHASES ARE PROHIBITED

What is a Split Purchase?

Split purchases (FAR 13.003(c) (2)). The requirement is the quantity known at the time of the buy. Splitting is the intentional breaking down of a known requirement to stay within a cardholders single purchase limit to avoid other procurement methods or competition requirements.

The micro-purchase thresholds are:

$3.5K for Supplies per mission,

$2.5K for Services, per mission, per year

$2K for Construction per mission.

All requirements that exceed the Micro Purchase Threshold **SHALL BE** submitted to MICC - FORT SILL for contracting action.

Knowingly “splitting a purchase” is:

- Improper Business Practice & Prohibited by FAR
- Warrants corrective action by Billing Official and/or APC

SUPPLY DEFINITION

All tangible property *(except land or interest in land)*, i.e., desks, chairs, paper, pens, pencils, etc.

This should cover the majority of your GPC purchases.

SERVICE DEFINITION

- **Service:** Directly engages the time and effort of a contractor whose primary purpose is to perform an identifiable task rather than to furnish an item of supply. This covers services performed by either professional or non-professional personnel whether on an individual or organizational basis. Some of the areas in which service contracts are found include: maintenance, overhaul, repair, salvage, modernization, or modification of supplies, systems, or equipment.
  - Purchases shall not be processed to pay for performance of an inherently governmental function.

- **Non-personal service:** The personnel rendering the services are not subject to the supervision and control usually prevailing in relationships between the Government and its employees. We do not pay for personal service; we only pay for Non-Personal Services.

CONSTRUCTION DEFINITION

- **Construction:** Construction, alteration (including painting), or repair (including dredging, excavating or painting) of buildings, structures, or other real property. For purposes of this definition, the terms “buildings, structures, or other real property” include, but are not limited to, improvements of all types, such as bridges, dams, plants, highways, parkways, streets, subways, tunnels, sewers, mains, power lines, cemeteries, pumping stations, railways, airport facilities, terminals, docks, piers, wharves, ways, lighthouses, buoys, jetties, breakwaters, levees, canals, and channels. Construction does not include the manufacture, production, furnishing, construction, alteration, repair, processing, or assembling of vessels, aircraft, or other kinds of personal property.

- **NOTE:** All construction requirements must be processed through your DPW Project Manager for approval. That approval must be in the GPC file. If the requirement exceeds $2,000, it must be submitted through PR Web to the Fort Sill’s Directorate of Contracting. Do not split it into small segments in order to use the GPC!

WARNING!

- The spending limits for supplies ($3,500), services ($2,500) and construction ($2,000) are set by Federal Statutes (Law) and **shall not be exceeded!**

- If a cardholder with the $3,500 supply limit uses their credit card for services over $2,500 or construction over $2,000, they may be suspended or have their spending limits lowered as determined by the MICC based on the severity of the offence!

MICRO-PURCHASE THRESHOLD EXCEPTIONS

PRINTING

- Printing Service SHALL be procured from the DLA-Printplant (Formally known as the Defense Automation & Production Service (DAPS)) with purchase card as a “Method of Payment”.
- Print jobs less than $3000 utilize existing purchase card
- Print jobs greater than $3000 requires an exception from the APC or a “DAPS Restricted” card from the MICC - FORT SILL APC.

COMMERCIAL TRAINING

- GPC will be used as the method of payment for all commercial training requirements equal to or less than $25,000.
- Cardholder will maintain a SF 182 as the transaction document. A copy must be sent to the APC for all transaction over $3.5K.

MANDATORY Sources!

FAR -- Part 8 Required Sources of Supplies and Services

►(i) Inventories of the requiring agency. *(this refers to the Army Supply System, MIL-strips, Internal Supply sys, DRMO, etc. anything that does not use a contract or GPC for procurement.)*

► (ii) Excess from other agencies (see Subpart 8.1); *http://gsaxcess.gov*

► (iii) Federal Prison Industries, Inc. (see Subpart 8.6); *http://www.unicor.gov*

► (iv) Supplies which are on the Procurement List maintained by the Committee for Purchase From People Who Are Blind or Severely Disabled (see Subpart 8.7); *http://www.abilityonecatalog.com (use the website to find the NSN# then order via the Base Supply Store, or GSA or any other business that can provide that NSN# product).*

► (v) Wholesale supply sources, such as stock programs of General Services Administration(GSA) Army Mandate: DoD-emall will be used for All Office supplies not available via AbilityOne per Deputy Assistant Secretary of the Army Memorandum dated 10/31/11. *https://dod-emall.dla.mil/acct/*

GSA Intra-government sales https://www.gsaglobalsupply.gsa.gov

GSA Advantage – Contract schedules for approved product prices *https://www.gsaadvantage.gov*

Army Specific procedures. https://chess.army.mil/ for all computer related needs

Documentation is required to explain why you did not purchase from a mandatory source before you search the next mandatory source on the list. Documentation may include screen prints of website searches with no results, or memorandums for record to explain the reasons.

EXCEPTIONS To the mandatory use of DOD EMALL are:

1. DOD EMALL is unavailable for more than 24 hours- proceed to GSA options, and then to commercial options if GSA fails to meet your needs.

RESTRICTIONS
DO NOT USE THE CARD FOR:

- Split purchases
- Items purchased for other than OFFICIAL USE
- Supply/service not authorized for purchase with appropriated funds
- Travel related expenses (i.e. transportation, food, drink, lodging)
- Cash advances, Gift Certificates and gift cards or Pre-paid cards.
- Long Term Rental or lease of land or buildings
- Fuel/repair of leased or GSA fleet vehicle
- Clothing/rank/gear that is normally secured under “Clothing Allowance.”

***(See Army GPC Operating Procedures, Appendix C. for a complete listing; you will be held accountable for it.)**

Property Book Office Procedures for GPC

Information furnished by Fort Sill CPBO Diana Small Aug 7th 2014

- References: AR 710-2 & AR 735-5
- REQUESTING SUPPLIES
  - Written requests need to be submitted prior to purchase (s).
  - Receipts/invoices are furnished to supporting PBO within 5 days for posting to the property book.
  - Screening is to determine the accounting requirement for the purchase equipment.

Accounting required for different classification of property

- Nonexpendable- requires Property Book accounting.
- Sensitive- requires Property Book accounting.
- Durable- requires accounting at user level.
- $5,000 threshold requires Property Book accounting.
- Property Book Officer's discretion

Milestones of Acquisition/property accountability

- Purchase Requests in GFEBS are created, funded and routed to CPBO for level 3 approval.
- Workflow system's PR in GFEB's are approved once information has been verified.
- Contract award or GPC sales invoice provides information on items being shipped to CPBO warehouse for processing and posting to the property book.

Milestones of Acquisition/property accountability, Cont.

- Units/Agencies will filled out DD 250 as receiver, sign and submit documentation to CPBO.
- AESIP requests will be submitted for NSN's requiring catalog information.
- Reconciliation with the PBO can be coordinated to ensure all equipment is posted correctly.

RETURNING MERCHANDISE

1. Over the Counter Purchase – Take items back to the vendor with receipt/invoice. Have credit issued back to card account or exchange.

2. Delivered Merchandise – Contact vendor immediately. Obtain a return authorization number before sending merchandise back. Keep all documentation pertaining to the return. Note: the Army may be responsible for return shipping and re-stocking fees depending on the situation.

3. Any merchandise purchased with the Government Purchase Card and returned to the vendor must be credited back to the card. Under no circumstances will cash or an in-store voucher be given to a cardholder for the return of any merchandise.

DISPUTE PROCEDURES

The most common causes of disputes are:

- unauthorized charges,
- items billed but not received,
- alteration of transaction amount
- and duplicate charges.

•The ARMY has implemented the “confirm and pay” procedures.
•All transactions will be approved initially.
•Cardholders are requested to dispute only after first attempting to resolve the problem with the vendor.
•If the vendor is not cooperative or timely; the Cardholder should telephone the bank customer service dept. to dispute the charge
•Cardholders must submit the Dispute Form (CSQI) by fax.

If bank resolves in favor of cardholder money is credited back to cardholders account (the credit will be matched to the GFEBS PR that was made for the matching/disputed charge transaction.

DISPUTE PROCEDURES (Continued)

- If credit does not appear on next month's electronic statement contact bank 1-(701)-461-3466

- With ACCESS Online, cardholders can verify within a week if that vendor has posted credits due to their account.

- Cardholders are only allowed 60 days, from the date of the statement in which the discrepancy posted, to dispute that transaction.

NOTE: Shipping/Handling Charges and Taxes are not disputable items per the terms of the agreement with US Bank and GSA. Cardholders are responsible for resolving these types of discrepancies with the vendor

CARD MISUSE VERSUS FRAUD

- Statutory authority:
  - Any misuse of the GPC is subject to criminal, civil, Uniform Code of Military Justice, administrative, and disciplinary actions as appropriate.
- Misuse
  - Intentional use of a government charge card for other than official government business constitutes misuse, and depending on the situation, may constitute fraud. Each agency develops and implements policies related to employee misuse of charge cards.
    - The different types of misuse include: Purchases that exceed the cardholder's limit; Purchases that are not authorized by the agency; Purchases for which there is no funding; Purchases for personal consumption, and purchases that do not comply with the policies that govern each particular card type.
- Fraud
  - A deception deliberately practiced with the motive of securing unfair or unlawful gain. Specific to our topic here, fraud can be an attempt to cheat the Government and corrupt its agents by using GSA SmartPay cards for transactions not part of official Government business. Like any deception, charge card fraud has its fair share of victims. Fraud can come in many disguises, such as false emails, mail, or phone calls. . In addition, non-cardholder fraud involves the use of the charge card or cardholder information by an unauthorized person.
  - Likewise, intentional misuse of a GSA SmartPay card by the cardholder can result in fraud

REGULATORY GUIDANCE CONCERNING FRAUD

Title 18 USC Section 287 and Title 10 USC Section 932

- Intentional use of the GPC for other than official Government business may be considered an attempt to commit fraud against the U.S. Government and will result in immediate cancellation of an individual's GPC and further disciplinary actions.

- The cardholder will be held personally liable to the Government for non-government transactions. Under Title 18 U.S.C. 287, misuse of the purchase card could result in a fine of not more than $10,000 or imprisonment for not more than five years or both. Military members who misuse the purchase card may be subject to court martial under Title 10 U.S.C. 932, UCMJ Art. 132. Depending on the circumstances, other sections of the US Code may apply and may carry additional penalties.

DoD Directive 7000.15, DoD **Accountable Officials and Certifying Officers**

- Certifying Officials are liable for erroneous payments resulting from the negligent performance of their duties explained in the DoD Directive 7000.15, "DoD Accountable Officials and Certifying Officers, and DoD 7000.14, DoD Financial Management Regulation", Volume 5, Chapter 33. Such liability may be relieved under specific circumstances (Title 31 USC Section 3527 and 2538).
- Furthermore, cardholders are held responsible for erroneous payments resulting from the negligent performance of their duties.

FRAUD-OUTSIDE SOURCES

Non-cardholder fraud involves use of the card or cardholder data by an unauthorized person. The risk of non-cardholder fraud is higher in certain situations including: Never Received, Lost Card, Stolen Card, Altered or Counterfeit Card, Account Takeover(hacking).

PREVENTING FRAUD

- Never give your card number over the phone unless you initiated the call or can verify the recipient (If Bank, call them back at Cust Svc number)
- Never place an order with your card over an unsecured web page
- Never allow anyone use of your card
- Never leave your card or bills unattended
- Consider who is within hearing distance when verbally giving your account number
- Shield your account # from view whenever possible
- Refrain from sending e-mail with your account # and expiration date

Monitoring your account on ACCESS Online

WHAT TO DO IF YOU SUSPECT FRAUD

- Call the Bank immediately and report the possible fraud
- Document as much information as possible
- Contact the APC right away and CID if necessary

FRAUD –Insider threat

Cardholder Fraud

- Cardholder conspires with business owner/local company to make purchases not authorized by the cardholder's agency.
- Business owner approaches cardholder and offers to provide kickbacks to cardholder if he or she made supply purchases from his business.
- Cardholder obtains goods and services for personal or other than official use.

Disciplinary escalation for misconduct

MILITARY DISCIPLINARY GUIDANCE

- Counseling
- Admonishment
- Reprimand
- Non-judicial punishment (Article 15)
- Civil enforcement action
- Pecuniary liability
- Criminal prosecution in civilian court

CIVILIAN EMPLOYEE DISCIPLINARY GUIDANCE

- 1st offense letter of counseling to removal
- 2nd offense 14-day suspension to removal
- 3rd offense 30-day suspension to removal

Criminal Prosecution is always a possibility depending on the severity of the offence.

Empowerment

- The purchase card empowers the user with a great ability to streamline the acquisition process and satisfy the needs of the job in an expeditious and efficient manner. As with all empowerment, it brings a responsibility to act ethically and within the constraints of laws and regulations.
- In the past, the ability to obligate Government funds was reserved for a very few highly trained procurement professionals. The trained professionals were schooled in law and regulation regarding the responsibilities inherent in spending taxpayer money. With the explosion of the GPC usage many non-procurement people now have been empowered to obligate Government funds.

Ethical Conduct

- Executive Orders (EOs) 12674 and 12731 establish Ethical Conduct and are the foundation for policy.
- EOs specify that employees are to avoid any action that might result in or create an appearance of:
  - Using public office for private gain,
  - Giving preferential treatment to any private organization or individual,
  - Adversely affecting public confidence in the Government's integrity,
  - Making unauthorized commitments, or
  - Defrauding the Government or failing to report fraud.
- The Agency Ethics Counselor is available for questions about the standards of conduct and ethical behavior.

ETHICS

Joint Ethics Regulatory Guidance

- In addition, all Government agencies are required to prescribe their own standards of conduct outlining agency exceptions to FAR 3.101 and disciplinary actions for persons violating those standards detailed in DoD Directive 5500.7-R, Joint Ethics Regulation, and Standards of Conduct for Employees of the Executive Branch, 5 CFR Part 2635).

- It is the responsibility of each employee to know and follow all general and agency standards of conduct.

Regulatory Guidance

Standards of Conduct

- Federal Acquisition Regulation (FAR 3.101) and 5 CFR Part 2635, Subpart B, establish general standards of conduct guidelines for all agencies. These regulations forbid any conflict of interest in Government-contractor relationships. No Government employee may solicit or accept any gratuity, gift, favor, entertainment or anything of monetary value from any party doing business with or seeking to obtain business with the employee's agency.

- 5 CFR 2635, Subpart G governs misuse of position including government resources. See 5 CFR 2635.701.

STANDARDS OF CONDUCT

- Gratuities/Gifts - $20 or less in value. Not to exceed $50 per year from the same vendor (off the shelf or promotional item)
- Avoid Appearance of Conflict of Interest
- Do not accept Special treatment or favoritism of vendors
- Do not use public office for private gain
- See separate training slides on Ethics

LIABILITY OF CARDHOLDERS AND BILLING OFFICIALS

- **Cardholders:**
  Shall be held PERSONALLY liable to the Government for any non-Government transactions.
- **Billing Officials:**
  Have pecuniary liable for improper payments resulting from misuse/abuse of the purchase card, and may be responsible to repay the Government if false, inaccurate, or misleading certification for payment is made.

THE DO'S AND DON'T OF PROCUREMENT INTEGRITY

- YOU SHALL:
  - 1. Fairly and impartially perform your duties.
  - 2. Report any offer of employment or gift that might raise doubts as to your impartiality.
  - 3. Safeguard source selection material.
  - 4. Accurately document all source selection decisions.
  - 5. If questions arise, consult an Ethics Counselor.
- YOU SHALL NOT:
  - 1. Use your position for personal gain.
  - 2. Make any promises that appear to bind the Government.
  - 3. Accept gifts from industry.
  - 4. Discuss procurement with unauthorized persons.
  - 5. Give the appearance of not being impartial.

ETHICS AND PROCUREMENT INTEGRITY

Attend annual Ethics Training

(online DAU class is acceptable for GPC purposes)

- Cumulative FY purchases ≥ $25,000 required to file an annual Confidential Financial Disclosure Report (OGE 450)

LET'S MAKE A GPC BUY! QUICK REFERENCE GUIDE

- You must have a valid military requirement with written authorization from your BO/Supervisor or Commander.
- You must first exhaust the mandatory sources of Supply. Attach your market research showing how, and when, you contacted the FAR 8 list of mandatory sources (in order).
- You must obtain all necessary approvals:
  - Billing Official (ALWAYS)
  - Budget authority funding approval (ALWAYS)
  - Property book items *
    - Copies of all purchase receipts must be sent to PBO within 5 days of purchase
    - Reference your local PBO
  - Maintenance significant items *
    - Check with DOL/DPW
  - Information management/IT/AV-equipment/computers or related items *
    - Check with the Network Enterprise Center and or your G6
  - Facility renovations/construction *
    - Check with DPW

* (When Applicable… if in doubt, ASK!)

LET'S MAKE A GPC BUY! QUICK REFERENCE (cont.)

- Always inform vendors that you are Exempt from Sales Tax.
  - If they insist on charging Sales Tax you will NOT purchase from that vendor!
  - Contact GSA Smartpay for State sales tax exemption help
    - https://smartpay.gsa.gov/about-gsa-smartpay/tax-information/state-response-letter.
  - Always check the receipt! If they charged tax by mistake get a refund before you leave the store!
- Always collect the receipt and attach your preceding purchase documentation to it.
- Always print the monthly statement and attach all your purchase receipt documentation packets to it before turning the originals over to the BO.
- Always print the internet screen that shows you reconciled/certified your account on time and keep it with your personal GPC records.

CONGRATULATIONS

(Print your name here)

This completes the Fort Sill Government Purchase Card Ethics and Operations Training

by signing below you herby confirm to have read the Fort Sill MICC GPC Ethics and Operations Training along with both the Army GPC Operating Procedures and the MICC GPC Operating Procedures documents and agree to be held accountable thereby.

(sign) (Date)

Mission and Installation Contracting Command